UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 13-039

v. * SECTION "J"

KEISHANDRA HOUSTON

* * *

FACTUAL BASIS

Were this matter brought to trial, the United States would prove, through competent witnesses and documentary evidence, the following beyond a reasonable doubt.

On April 20, 2010, an explosion and fire occurred on the Deepwater Horizon, an oil rig in the Gulf of Mexico where British Petroleum (BP) had been drilling a well. Thereafter, BP established the Gulf Coast Claims Facility (GCCF) to administer, mediate, and settle certain claims of individuals and business for losses incurred as a result of the Deepwater Horizon incident. The GCCF began receiving and processing such claims on August 23, 2010. The GCCF required any individual filing a claim to submit valid documentation as proof of loss or reduction in earnings due to the oil spill.

In September 2010 the defendant **KEISHANDRA HOUSTON** submitted a fraudulent claim to the GCCF for lost earnings in the amount of \$8,640.00. **KEISHANDRA HOUSTON** falsely represented that she worked as a cook at a seafood restaurant and suffered financially due to lost employment as a result of the Deepwater Horizon incident. To support this fraudulent claim, **KEISHANDRA HOUSTON** created two false earnings statements which incorrectly indicated that the she was employed by a seafood restaurant. On September 30, 2010, **KEISHANDRA HOUSTON** submitted the false earnings statements to the GCCF by transmitting them via email from the Eastern District of Louisiana to the GCCF's server in Dublin, Ohio. In response to the claim, the GCCF sent **KEISHANDRA HOUSTON** a check via Federal Express for \$5,900.00. **KEISHANDRA HOUSTON** cashed the check and spent all of the money.

KEISHANDRA HOUSTON Date Defendant CYNTHIA CIMINO Date Attorney for Defendant CHANDRA MENON Date

APPROVED AND ACCEPTED:

Assistant United States Attorney